

***Exhibit A***

Robert L. Stepan  
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James C. Mumion  
Meyer, Shaffer & Stepan, PLLP  
430 Ryman Street  
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*Attorneys for Plaintiff*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION**

TRACY CAEKAERT, and CAMILLIA  
MAPLEY,

Plaintiffs,

vs.

WATCHTOWER BIBLE AND TRACT  
SOCIETY OF NEW YORK, INC.,  
WATCH TOWER BIBLE AND TRACT  
SOCIETY OF PENNSYLVANIA, and  
BRUCE MAPLEY SR.,

Defendants,

WATCHTOWER BIBLE AND TRACT  
SOCIETY OF NEW YORK, INC.,  
Cross Claimant.

BRUCE MAPLEY, SR.,  
Cross Defendant.

Case No. CV-20-52-BLG-SPW

**AFFIDAVIT OF  
MATTHEW L. MERRILL IN  
SUPPORT OF *PRO HAC VICE*  
APPLICATION**

I, Matthew L. Merrill, declare and states as follows:

1. My personal residence is in the state of Colorado. I am the managing member and sole practitioner at Merrill Law, LLC (a Colorado limited liability company), whose business address is 1863 Wazee Street, #3A, Denver, Colorado 80202. The telephone number is (303) 947-4453 and my email address is matthew@merrillwaterlaw.com.
2. In accordance with this Court's Local Rules, payment of this Court's \$262.00 pro hac vice admission fee has been submitted to the Court with this Motion.
3. I have completed the District of Montana's online training for electronic filing.
4. I am a member in good standing of the State Bar of Colorado and have been in good standing since my admission in October 2006. My Colorado State Bar number is 37918.
5. I am a member in good standing and eligible to practice in the Colorado Courts, including the Colorado Supreme Court.
6. I am not currently suspended or disbarred in any Court.
7. I have never been held in contempt, otherwise disciplined by any Court for disobedience to its rules or order, or sanctioned under Fed. R. Civ. P. 11 or 37(b), (c), (d), or (f).

8. I have not petitioned the Court for *Pro Hac Vice* admission within the last two years.

9. I understand that *Pro Hac Vice* admission in this Court is personal to me only and is not admission to a law firm and that I will be held fully accountable for the conduct of litigation in this Court.

10. I have complied with Montana Rule of Professional Conduct 8.5 and file contemporaneously with this Affidavit my Certification that I agree I will be bound by the Rules of Professional Conduct in my practice of law in the State of Montana and that I will be subject to the disciplinary authority of the State of Montana. I have also mailed a copy of the Certificate to the State Bar of Montana.

11. I will be representing Plaintiffs Tracy Caekaert and Camillia Mapley in this litigation as co-counsel of the law firm Meyer Shaffer and Stepan, PLLP, 430 Ryman Street, Missoula, Montana 59802, telephone (406) 543-6929, with whom opposing counsel may readily communicate and upon whom papers shall be served, and who will be responsible to participate as required under Local Rule 83.1(d)(2).

I declare under penalty of perjury that the foregoing is true and correct.

DATED this 30<sup>th</sup> day of March, 2022.

By:   
Matthew L. Merrill

State of Colorado

County of Anapahoe

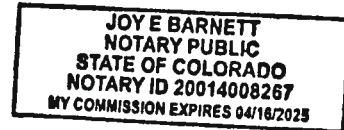
This instrument was signed and sworn to before me on March 30, 2022 by

Matthew L. Merrill.

Joy E. Barnett  
(Notary Signature)

Joy E. Barnett  
Print Name of Notary Public

Notary Public for the State of Colorado



Residing at: 333 W. Hampton Ave, #1050, Colorado 80110

My Commission Expires: 4-16-25

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Ryan R. Shaffer  
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Defendants, )

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SOCIETY OF NEW YORK, INC., )  
Cross Claimant, )

BRUCE MAPLEY, SR., )  
Cross Defendant. )

Case No. CV-20-52-BLG-SPW

**CERTIFICATION UNDER  
MONTANA RULE OF  
PROFESSIONAL  
CONDUCT 8.5 OF  
MATTHEW L. MERRILL**

I, Matthew L. Merrill, declare and states as follows:

1. Pursuant to Montana Rule of Professional Conduct 8.5, I hereby certify, under oath to this Court that, except as to Rules 6.1 through 6.4, I will be bound by these Rules of Professional Conduct in my practice of law in this State and will be subject to the disciplinary authority of this State.

2. I also hereby certify that I mailed a copy of this Certification to the State Bar of Montana as indicated in the Certificate of Mailing.

I declare under penalty of perjury that the foregoing is true and correct.

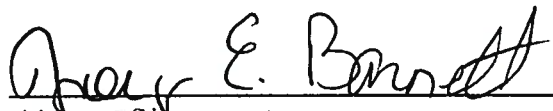
DATED this 30<sup>th</sup> day of March, 2022.

By:   
Matthew L. Merrill

State of Colorado

County of Anchorage

This instrument was signed and sworn to before me on March 30, 2022 by  
Matthew L. Merrill.

  
(Notary Signature)

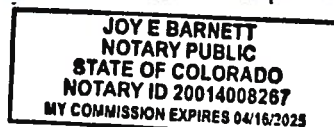
Joy E. Barnett

Print Name of Notary Public

Notary Public for the State of Colorado

Residing at: 333 W Hampden Ave, #1050, 80110

My Commission Expires: 4-16-25



Certification Under Montana Rule of Professional Conduct 8.5 of Matthew L. Merrill

*Cackaert and Mapley v. Watchtower Bible Tract of New York, Inc., et al.*

**CERTIFICATE OF SERVICE**

Pursuant to Local Rule 1.4, this document has been served on all parties via electronic service through the Court's Case Management/Electronic Case Filing (CM/ECF) system. In addition, I hereby certify that on April 26<sup>th</sup>, 2022, a copy of the foregoing document was served on the State Bar of Montana at the address listed below.

State Bar of Montana  
P.O Box 577  
Helena, MT 59624

By: /s/ Ryan Shaffer  
Ryan R. Shaffer  
MEYER, SHAFFER & STEPANS PLLP

*Attorneys for Plaintiffs*